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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

ULISES CASTELLANOS-CISNEROS,
JERONIMO MADRIZ-REYNA,

Defendants.

Criminal No. CR 07-00004 CRB

**STIPULATION AND ~~[PROPOSED]~~
ORDER EXCLUDING TIME**

The above-captioned matter came before the Court on February 14, 2007, for a status hearing. Both defendants, Ulises Castellanos-Cisneros, and Jeronimo Madriz-Reyna were present and were represented by their attorneys, Arturo Hernandez-M, Esq., and Jesse J. Garcia, Esq., respectively, and the government was represented by Richard J. Cutler, Assistant United States Attorney. Mr. Garcia was making his first appearance for defendant Madriz-Reyna having substituted into the case as counsel. Pursuant to a request from both defendants for time to prepare and file motions and to further investigate the case, as well as a separate request from

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Mr. Garcia for time to familiarize himself with the case and then file motions, the Court set a the date for hearing on motions for April 25, 2007 at 2:15 p.m. The Court made a finding on the record that the time between February 14, 2007, and April 25, 2007, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h), because the ends of justice served by taking such action outweighed the best interest of the public and the defendants in a speedy trial. That finding was based on the Court's finding of the defendants' needs to effectively investigate and prepare the matter, taking into account the exercise of due diligence, as well as the need for substitution of counsel and for preparation and filing, and then decision on pretrial motions. That finding was made pursuant to 18 U.S.C. §§ 3161(h)(1)(F), (h)(8)(A), and (h)(8)(B)(iv).

The parties hereby agree to and request that the case be continued until April 25, 2007, at 2:15 p.m. for hearing on motions and that an exclusion of time until that date be granted. The parties agree and stipulate that the additional time is appropriate and necessary under Title 18, United States Code, Section §§ 3161(h)(1)(F), (h)(8)(A), and (h)(8)(B)(iv), because the ends of justice served by this continuance outweigh the best interest of the public and the defendants in a speedy trial.

DATED: 2/14/07

/S/
ARTURO HERNANDEZ-M
Counsel for DEFENDANT
ULISES CASTELLANOS-CISNEROS

DATED: 2/14/07

/S/
JESSIE J. GARCIA
Counsel for DEFENDANT
JERONIMO MADRIZ-REYNA

DATED: 2/14/07

/S/
RICHARD J. CUTLER
Assistant United States Attorney

SO ORDERED.

DATED: February 26, 2007

**STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME
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